

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AIR PRODUCTS LLC,

Plaintiff,

vs.

CIECH, S.A.,

Defendant.

Case No. 5:12-cv-6953-JKG


**DECLARATION OF ARTUR OSUCHOWSKI IN SUPPORT OF MOTION TO DISMISS
ON THE BASIS OF *FORUM NON CONVENIENS***

I, Artur Osuchowski, declare as follows:

1. I am a Management Board member with Ciech S.A. (“Ciech”), located in Warsaw, Poland. I have been an employee of Ciech since April 2, 2008. Through my employment with Ciech, I have gained personal familiarity with Ciech’s operations. I make the following declaration on the basis of this personal knowledge.
2. Ciech’s corporate headquarters is located at 182 Pulawska Street in Warsaw, Poland.
3. Ciech does not maintain any offices, employees, records, or facilities of any kind within the United States.
4. Ciech maintains its corporate documents in Poland.
5. The Ciech employees with knowledge relevant to the allegations in the Second Amended Complaint reside in Poland.
6. Mr. Ryszard Kunicki, Ciech’s former Chief Executive Officer, and Mr. Rafal Rybkowski, its former Chief Financial Officer, are no longer employed at Ciech. To the best of my knowledge, Mr. Kunicki and Mr. Rybkowski continue to reside in Poland.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 16, 2013



Artur Osuchowski